

1 verderabartolomeind 2 LEONARDO M. RAPADAS United States Attorney 3 KARON V. JOHNSON Assistant U.S. Attorney 4 Sirena Plaza Suite 500 108 Hernan Cortez Avenue Hagatna, Guam 96910 Telephone: (671) 472-7332 6 Telecopier: (671) 472-7334 7 Attorneys for the United States of America 8 9 10 UNITED STATES OF AMERICA, 11 12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

MAR 0 5 2008

**JEANNE** G. QUINATA Clark of Court

## IN THE UNITED STATES DISTRICT COURT

## FOR THE TERRITORY OF GUAM

CRIMINAL CASE NO. 08-00018 Plaintiff, INDICTMENT **BULK CASH SMUGGLING** VS. OUT OF THE UNITED STATES [31 U.S.C. § 5332] (Count I) ERNESTO PAGLICAWAN VERDERA and

MARK ANTHONY BARTOLOME,

Defendants.

FORFEITURE ALLEGATION [31 U.S.C. § 5332(b)(2)] (Count II)

THE GRAND JURY CHARGES:

## COUNT I - BULK CASH SMUGGLING OUT OF THE UNITED STATES

On or about February 28, 2008, in the District of Guam, the defendants herein, ERNESTO PAGLICAWAN VERDERA and MARK ANTHONY BARTOLOME, did unlawfully, willfully and knowingly, with the intent to evade a currency reporting requirement under Title 31, United States Code, Section 5316, conceal more than \$10,000 in currency or other monetary instruments in an article of luggage and other container, and did attempt to transport said currency from a place within the United States, to a place outside the United States, to-wit: \$810,631 in United States currency from Guam to the Philippines, the said defendants knowing that they were required to file a report with the Secretary of the Treasury of

Case 1:08-cr-00018

Document 13 Filed 03/05/2008

Page 1 of 2

the amount of money they were attempting to transport, in violation of Title 18, United States Code, Section 2 and Title 31, United States Code, Section 5332.

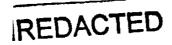
## **COUNT II - FORFEITURE ALLEGATION**

The allegations of Count I are hereby realleged and incorporated by reference herein for the purpose of alleging criminal forfeiture pursuant to Title 31, United States Code, Section 5332(b)(2), and Title 21, United States Code, Section 853.

From their engagement in the violation alleged in Count I of this Indictment, punishable by imprisonment for more than one year, the defendants herein, ERNESTO PAGLICAWAN VERDERA and MARK ANTHONY BARTOLOME, shall forfeit to the United States, pursuant to Title 31, United States Code, Section 5332(b)(2) and Title 21, United States Code, Section 853, the personal property involved in the commission of said violation, to-wit: approximately \$810,631 in United States currency, recovered on or about February 28, 2008, from the defendant, all in violation of Title 31, United States Code, Section 5332(b)(2).

Dated this 5th day of March 2008.

A TRUE BILL.



LEONARDO M. RAPADAS United States Attorney Districts of Guam and NMI

Assistant U.S. Attorney

26

27

28

First Assistant U.S. Attorney